

# **EXHIBIT 12**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION

4           IN RE:   NATIONAL PRESCRIPTION        ) No. 17-md-2804  
5           OPIATE LITIGATION NO. 2804            )  
6    )  
7           APPLIES TO ALL CASES                   ) Hon. Dan A. Polster  
8    )

9  
10                   HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
11                   PROTECTIVE REVIEW

12                   VIDEO DEPOSITION OF LYNN PHILLIPS

13                                   February 12, 2019  
14                                   9:05 a.m.

15                   Reporter:   John Arndt, CSR, CCR, RDR, CRR  
16                                   CSR No. 084-004605  
17                                   CCR No. 1186

1     communications position.

2             Q.     So what -- how would you describe the job  
3     that you did there in terms of what your obligations  
4     were?

5             A.     Let me see. I was in charge of media  
6     relations, so working with members of the media, trade  
7     media, and mainstream media on inquiries about the  
8     company. Worked on earnings -- quarterly earnings  
9     after the company spun off. Worked with our internal  
10    team where appropriate on communicating things to the  
11    workforce. It's been a long time since, so I don't  
12    remember my specific duties day-to-day.

13            Q.     Which corporate entity did you work for?

14            A.     Can you rephrase the question?

15            Q.     Yeah. Who did you work for? There are  
16    several different entities, as I understand it, among  
17    the Mallinckrodt name, but what -- which one did you  
18    work for?

19            A.     I don't know.

20            Q.     Did you work for the entity that was  
21    publicly-traded?

22            A.     I'm not sure. I don't know the  
23    differences between the -- can you give me something  
24    more specific? I -- the company that I worked for was

1 publicly-traded.

2 Q. You at some point worked in the news  
3 business; is that right?

4 A. Correct.

5 Q. When did you last work in the news  
6 business?

7 A. 2010, shortly before we moved to St.  
8 Louis. So 2010.

9 Q. Was that in New York?

10 A. Uh-huh.

11 Q. Did you work for ABC News at that point?

12 A. Yes. Yes.

13 Q. So you worked with them from 2000 to 2010?

14 A. Yes, and prior to 2000 as well.

15 Q. Oh, I see. Yeah. Sorry. We're going to  
16 get this printed, but I don't have a printed copy, so  
17 I'm just reading off the screen here.

18 A. Uh-huh.

19 Q. Right. I see June 1997 is when you first  
20 started as a producer with ABC News in New York.

21 A. Yes.

22 Q. And you were with ABC News through 2010?

23 A. Correct.

24 Q. Did you move to Missouri to take the job